

January 12, 2024

The Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *United States v. Teman*, 19-cr-00696-PAE-1

Dear Judge Engelmayer:

We represent Ari Teman and are filing this letter in support of Mr. Teman's motion for compassionate release under 18 U.S.C. § 3582(c)(1)(A). We are cognizant of the Court's docket entry of December 5, 2023, indicating that the Court "does not invite a reply." Thus, in lieu of a reply, we respectfully submit only this one-page letter together with the attached letter from Dr. Alon Seifan stating that Mr. Teman's medical conditions have "progressively worsened" while in Federal Bureau of Prisons ("BOP") custody, and that Mr. Teman's deterioration "most likely has induced the fainting, falling, vomiting, headache, and numbness."

We note that the Government's response to the compassionate release motion is incomplete. On or about January 3, 2024, FCI Case Manager Kost also sent an email to U.S. Probation Officer David Ozoria confirming that Mr. Teman was unwell, and that Mr. Teman's medical status was the reason why the BOP had recommended that he be placed at a residential reentry center. The only reason that BOP is not placing Mr. Teman *immediately* into a residential reentry center is that the center does not have bed space until May 14, 2024.

Our position is that the Court cannot wait for a bed space to become available, given Mr. Teman's long-standing health conditions, his inability to receive proper care at FCI Miami, and his ability to acquire proper care should the court grant his motion. The court should grant the motion for compassionate release.

Sincerely,

/s/ Edoardo Maffia  
Edoardo Maffia  
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*Counsel for Ari Teman*

The Honorable Judge Paul Engelmayer  
District Judge  
Southern District of New York

January 11, 2024

Re: Medical Urgency of Compassionate Release for Ari Teman

Your Honor and to whom it may concern:

My name is Dr. Alon Seifan, I am a Board-Certified Neurologist, with UCNS-Certification in Behavioral Neurology & Neuropsychiatry, and have previously written to the Court in September about Ari Teman (date of birth 05/10/1982). At that time, I provided results of my evaluation of him in my office regarding his severe medical conditions. Ari meets diagnostic criteria for several, co-morbid Neuropsychiatric diagnoses most of which are exacerbated by sleep deprivation, psychosocial stressors, medical symptoms such as allergic and gastrointestinal and respiratory distress, and neurological symptoms including numbness and pain.

It has come to my attention that through much of Mr. Teman's incarceration, he has reported suffering from fainting, falling, sleep deprivation, weight loss, nausea, dizziness, fever, shakes, weakness in his legs, and numbness on the left of his body. He has vomited and required transport by stretcher to the prison medical office. His diet has included less than 900 calories per day very often, which is partially related to his inability to eat dairy or wheat, and his limited kosher protein options. The environment he has been in is a common room of about 60 men, who themselves are coughing and flushing the in-room toilet several times per day. This environment has led to a significant disruption in his ability to sleep, which is essential for his mental and medical stability. The environment has also caused him significant stress and worry about spreading of material that could exacerbate his well-established immunological and respiratory symptoms.

His condition has progressively worsened, having already started from a seriously at-risk level that required ready access to medical care and appropriate diet. The level of deterioration most likely has induced the fainting, falling, vomiting, headache, and numbness. Given that Ari already suffers from severe depression, all of these symptoms concern me as potentially threatening to his survival.

I strenuously urge the Court to grant Compassionate Release in this very vulnerable individual, and to do so on an urgent, emergency basis before Mr. Teman's condition worsens. This release will enable him immediate access to the level of medical and neuropsychiatric care that he needs.

Should you have any further questions please do not hesitate to contact me.

Sincerely,

DocuSigned by:

Dr Alon Seifan

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